

# Exhibit J

## Bunting, Jeremy

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**From:** Andrea Schillaci <AS@hurwitzfine.com>  
**Sent:** Tuesday, June 14, 2022 3:45 PM  
**To:** daniel.isaacs@danwisaacesq.com; Peter J. Gleason (PJGleason@aol.com)  
**Cc:** Snyder, Orin; Ascher, Brian C.; Bunting, Jeremy; Williams, Greta B.; Perloff-Giles, Alexandra  
**Subject:** J.C. v. Dylan

[WARNING: External Email]

Counsel:

Plaintiff has failed to provide supplemental responses to cure the deficiencies in her responses to Defendant's First Requests for Production and Interrogatories, as demanded by my June 8, 2022 letter.

We would like to request a meet and confer tomorrow, **June 15 at 2:00 pm** to discuss when we can expect the supplemental responses, as well as Plaintiff's first document production. Defendant's First Requests for Production were served nearly three months ago. As you were ethically obligated to review these documents before you filed Plaintiff's lawsuit a year ago, the universe of documents must be accessible to you and thus there is no excuse for the delay.

In addition, we need revised authorizations for [REDACTED] generally (not a specific provider at [REDACTED]), [REDACTED] and [REDACTED] (again, not identifying a specific provider at [REDACTED]). Further, with respect to the [REDACTED] records, Plaintiff is required to sign an additional release form as per [REDACTED] policies. We also require current addresses for [REDACTED] and [REDACTED]. Further, we were not provided with authorizations for [REDACTED], [REDACTED], and [REDACTED]. Those names were not previously provided so we need full names and accurate addresses on HIPAA compliant authorizations.

Please advise immediately if you are not available to meet and confer on these issues tomorrow at 2:00 pm. We hope we do not have to again rely on the Court to compel Plaintiff's cooperation in discovery, but are prepared to do so absent a conference on these issues and a meaningful commitment from Plaintiff to fulfill her obligations promptly.

Regards,



**Andrea Schillaci**  
Member

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